



Cheshire East Local Plan

Site Allocations and Development Policies Document

Cheshire East Council Hearing Statement

Matter 4: Employment and Economy

Hearing date: Wed 20 Oct 2021

Introduction

1. This hearing statement has been prepared by Cheshire East Council in response to the Inspector's Matters, Issues and Questions for the Examination Part 1 [INS/08] and addresses Matter 4: Employment and Economy.
2. The abbreviations used in this hearing statement are as defined in the Inspector's MIQs.

Key Documents

3. The following key documents are relevant to this response:
 - Council Response to Inspector's Initial Questions [CEC/01]
 - Site Selection Methodology Report [ED 07]
 - Employment Allocations Review [ED 12]
 - Crewe Settlement Report [ED 28]
 - SADPD Consultation Statement (Revised Publication Draft Version) [ED 56]
 - SADPD Regulation 20 representations statement Consultation Statement Part II) [ED 56a]

Strategic Employment Areas (Policy EMP 1)

Q69 Given that the proposed Strategic Employment Sites are already identified as key employment areas and protected for employment use by Policy EG 3 of the LPS, does policy EMP 1 serve a clear purpose or does it simply duplicate the policies of the LPS?

4. Whilst some of the Strategic Employment Areas listed in Policy EMP 1 include allocations for new development, they are all existing operational employment areas. They are designated as Strategic Employment Areas under Policy EMP 1 as they are of particular significance to the local economy. The protection of these areas for employment use and support for further investment is of particular importance to the local economy.
5. The areas are listed as 'key employment areas' in the justification to LPS Policy EG 3 'Existing and allocated employment sites' (at ¶11.25). Whilst some are shown as 'Strategic Employment Areas' on the relevant town map in Chapter 15 of the LPS, those that are not within one of the PTs or KSCs are not shown on any map. In addition, none of the 'key employment areas' listed in the LPS are shown on the adopted policies map.
6. These 'key employment areas' (as listed in LPS ¶11.25) / 'strategic employment areas' (shown on the LPS Chapter 15 town plans) have some status in the LPS by being listed in the justification to Policy EG 3 and (in some cases) being shown on a town plan in Chapter 15. The adopted policies map should geographically illustrate the application of policies in the development plan. The addition of Policy EMP 1 in the SADPD allows this issue to be regularised and confirms the status of each of these areas as

strategic employment areas, with a defined boundary as shown on the adopted policies map.

7. Existing and allocated employment sites are already protected for employment use under LPS Policy EG 3. However, the addition of SADPD Policy EMP 1 sets out clearly that these strategic employment areas are of particular significance to the local economy and should be protected; and it is explicitly supportive of proposals for further investment.

Q70 What are the criteria for the designation of these sites as Strategic Employment Sites and how has their selection been justified against other key employment sites which have not been similarly designated, such as the British Salt plant at Middlewich?

8. The Strategic Employment Areas designated under Policy EMP 1 are those existing operational employment areas shown as 'strategic employment areas' on the town maps in Chapter 15 of the LPS and/or those identified as 'key employment areas' in the justification to LPS Policy EG 3 'Existing and allocated employment sites' (at ¶11.25).
9. It is recognised that many other existing employment areas make their own important contribution to the local economy and these will continue to be protected in accordance with the criteria set out in LPS Policy EG 3.

Employment Allocations (Policy EMP 2)

Q71 Is the re-allocation of saved employment sites in Policy EMP 2 justified based on the evidence and consistent with national policy and the LPS? In particular, is there is a reasonable prospect of these sites being used for employment purposes over the plan period, given the length of time they have been undeveloped?

10. The NPPF (¶122) requires planning policies to be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where it is considered that there is no reasonable prospect of an application coming forward for the use allocated in a plan, the land should be re-allocated for a more deliverable use (or de-allocated if appropriate) as part of plan updates.
11. The evidence set out in the Employment Allocations Review [ED 12] sets out the evidence to demonstrate that the re-allocation of the sites listed in Policy EMP 2 is justified and consistent with national policy. The Employment Allocations Review follows a two-stage process in considering the saved employment allocations. At stage 1, it makes an assessment of whether there is a reasonable prospect of the site being used for employment purposes during the plan period. This considers the overall suitability of each site in planning terms, its market attractiveness and any barriers to delivery to make an assessment of the prospects of the site being used for employment purpose during the plan period. These assessments are available in Chapter 4 of the Employment Allocations Review [ED 12].

12. Where the Employment Allocations Review identifies that there is a reasonable prospect of the site being used for employment purposes, the suitability of each site for continued allocation is considered under stage 2. This recognises that the planning policy framework may have changed since the sites were first allocated for employment use. For stage 2, sites were assessed using the assessment criteria set out in the Site Selection Methodology Report [ED 07] and also subject to SA and HRA.
13. Following consideration of the prospects of being used for employment, and the suitability for continued allocation, several saved employment allocations have not been brought forward in SADPD Policy EMP 2. The sites identified in Policy EMP 2 are suitable for continued employment allocation and have a reasonable prospect of being used for employment purposes in the plan period. They are justified based on the evidence and consistent with national policy.

Q72 Is the re-allocation of Site EMP 2.1 for employment use consistent with proposals for this area in the emerging Crewe Hub Area Action Plan (AAP) and with the proposed route options for the Southern Link Road Bridge?

14. Site EMP 2.1 'Weston Interchange, Crewe' is within a large established employment area to the south east of the existing Crewe Railway Station. Whilst its use for employment would be consistent with proposals in this area in the emerging Crewe Hub AAP, part of the site is identified as being within the preferred route option for the Southern Link Road Bridge, which was originally approved for inclusion in the final Draft Crewe Hub AAP by a meeting of the council's Cabinet on 5 November 2019¹.
15. At the 10 March 2020 meeting of the council's Cabinet², the draft Crewe Hub AAP was approved for publication under Regulation 19³, which included the preferred route of the Southern Link Road Bridge. Although approved, the draft Crewe Hub AAP has yet to be published under Regulation 19.
16. Since the decisions to approve the preferred route and the approve the draft Crewe Hub AAP for publication, several factors have impacted the appropriateness and timing of the AAP and the Southern Link Road Bridge.
17. The council has undertaken comprehensive assessments of the impacts of the pandemic on the AAP and Crewe Southern Link Road Bridge and will take these recommendations and next steps to its Corporate Policy Committee on 4 November 2021⁴ and seek a decision as to whether to progress the AAP and Crewe Southern Link Road Bridge as planned or to withdraw the previous decisions and develop a new policy framework and transport solution that can have the greatest positive impact for Crewe.

¹ <http://moderngov.cheshireeast.gov.uk/ecminutes/ieListDocuments.aspx?CId=241&MId=7461>

² <http://moderngov.cheshireeast.gov.uk/ecminutes/ieListDocuments.aspx?CId=241&MId=8084>

³ Of the Town and Country Planning (Local Planning) (England) Regulation 2012

⁴ <http://moderngov.cheshireeast.gov.uk/ecminutes/ieListDocuments.aspx?CId=959&MId=8661>

18. Only part of Site EMP 2.1 is within the area required for the preferred route of the proposed Southern Link Road Bridge and, given the uncertainties over progress of the Crewe Hub AAP and delivery of the Southern Link Road Bridge, it is appropriate to continue to allocate Site EMP 2.1 for employment use. As set out in the Employment Allocations Review [ED 12], Site EMP 2.1 is suitable for continued allocation and there is a reasonable prospect of the site being developed for employment purposes.

Q73 Given the location of Site EMP 2.8 within the Jodrell Bank consultation zone and the World Heritage Site buffer zone, to ensure the plan is effective should this be identified as a constraint in the justification to Policy EMP 2?

19. Radio telescopes at Jodrell Bank carry out a wide range of astronomical observations as part of national and international research programmes, involving hundreds of researchers from the UK and around the world. The telescopes are equipped with state-of-the-art cryogenic low-noise receivers, designed to pick up extremely weak signals from space. The location of Jodrell Bank was chosen by Sir Bernard Lovell in 1945 as a radio-quiet rural area away from the interference on the main university campus in Manchester.
20. Within the Jodrell Bank Radio Telescope Consultation Zone, LPS Policy SE 14 'Jodrell Bank' does not allow development that would impair the efficiency of the telescope.
21. Equipment commonly used at residential dwellings causes radio frequency interference that can impair the efficient operation of the radio telescopes at Jodrell Bank. This evaluation is based on the definition of the level of harmful interference to radio astronomy specified in ITU-R.769, the International Telecommunications Union 'Protection criteria used for radio astronomical measurements', which has been internationally adopted and is used by Ofcom and other bodies in the protection of parts of the spectrum for radio astronomy.
22. It is recognised that there is significant development across the region surrounding the telescopes and Jodrell Bank carries out analysis that takes into account the distribution of development and the effect of the intervening terrain between any location and the telescope itself. This analysis uses data provided by Cheshire East and the Ordnance Survey and uses the officially recognised propagation model provided by the International Telecommunications Union 'Prediction procedure for the evaluation of interference between stations on the surface of the Earth at frequencies above about 0.1 GHz' (ITU-P.452).
23. Site EMP 2.8 benefits from a hybrid planning consent (part full/part outline) granted on 7 Feb 2019 (18/4283C). Part of the site has already been completed and the remainder benefits from an extant outline permission.
24. The council notes that Jodrell Bank did not object to the approved development under 18/4283C.

25. The location of Site EMP 2.8 within the Jodrell Bank Consultation Zone and the WHS Buffer Zone is not considered to be a constraint to the development of the site for employment uses and it does not need to be listed as such to ensure the plan is effective.
- Q74 Given the requirement for a Mineral Resource Assessment to be submitted as part of any planning application on Site EMP 2.8, which may require minerals to be extracted before development proceeds, to avoid sterilisation of the mineral resource, is there a reasonable prospect that the site will be available and developable for employment purposes within the plan period?**
26. Site EMP 2.8 benefits from a hybrid planning consent (part full/part outline) granted on 7 Feb 2019 (18/4283C). Part of the site has already been completed and the remainder benefits from an extant outline permission.
27. The requirement for a Minerals Resource Assessment referenced at ¶7.5 of the SADPD was made partly on the basis of the overall site being 2.3 hectares in size. However, it is now clear that only a small part of the site (around 0.75 hectares) remains undeveloped and this is considered to be too small for any mineral resource present to be viably removed prior to redevelopment commencing. Therefore, it is no longer considered necessary for the supporting information to Policy EMP 2 to reference the need for a Mineral Resource Assessment as part of any application. A Main Modification could be made to remove the reference to needing a Minerals Resource Assessment.
28. The site is partly developed and the remainder benefits from an extant outline planning permission. There is a reasonable prospect that the site will be available and developable for employment purposes within the plan period.

Site Allocations for Employment Sites (Sites CRE 1 and 2)

- Q75 To ensure the policy for Site CRE 1 is clearly written, unambiguous and effective in requiring development proposals for the Bentley Motors site to preserve the significance of the office and showroom on Pyms Lane as a locally listed building and non-designated heritage asset, should it refer to the recommendations of the Heritage Impact Assessment of the site submitted with the SADPD⁵, in particular the mitigation measures to reduce harm?**
29. The policy is considered to be clear and unambiguous as drafted. As set out on page 313 of the SADPD Consultation Statement (Revised Publication Draft Version) [ED 56] the policy was amended following the First Draft SADPD Regulation 18 consultation in response to issues raised by the site promoter, Bentley Motors.
30. Criterion 4 requires that development proposals have regard to heritage assets and their settings in accordance with LPS Policy SE 7 'The historic environment' and Policy HER 7 'Non-designated heritage assets'. ¶12.19 of

⁵ Core document ED48

the supporting text also provides more information about the heritage assets at the site.

31. As set out in the Council response to Inspector's initial questions [CEC/01], the Bentley site is being brought forward in several phases with no single application covering the whole site. There may be circumstances whereby a particular proposal has no (or neutral) impact on the main showroom/office due to its location and presence of intervening buildings and the mitigation measures cited in the Heritage Impact Assessment are not relevant. The need for a Heritage Impact Assessment based on specific development proposals will be considered at the individual planning application stage, having regard to the other policies listed.
32. However, the council is happy to assist the Inspector if it is considered that a Main Modification is needed to include the Heritage Impact Assessment mitigation measures in the policy.

Q76 Are the development requirements for Site CRE 2, Land off Gresty Road, specified in criteria 3, 6 and 8 of the policy justified by the evidence? Would revisions to these criteria, which more precisely identify the relevant mitigation measures, strike an appropriate balance between helping to create the conditions in which the business can invest and expand, and minimising the environmental impacts of its development for the purpose for which the site is allocated?

33. The development requirements for Site CRE 2 are justified by the evidence that is documented in the Crewe Settlement Report [ED 28].

Criterion 3: Woodland

34. As highlighted in the traffic light assessment for this site (pp110-113 of the Crewe Settlement Report [ED 28]) the woodland should be retained. The policy wording seeks to strike a balance by requiring that the woodland area is retained unless there are clear overriding reasons for any loss and provision is made for net environmental gain in accordance with LPS Policy SE 5 'Trees, hedgerows and woodland'.

Criteria 6: Gresty Brook and undeveloped buffer

35. The Environment Agency require that unobstructed access is provided to Gresty Brook for maintenance purposes and an 8 metre undeveloped buffer is maintained (¶4.30 of the Crewe Settlement Report [ED 28]).
36. As highlighted in the traffic light assessment for this site (pp110-113 of the Crewe Settlement Report [ED 28]) there is also potential for an ecological impact, including on otters and native crayfish. A buffer is also required for ecological purposes and this is highlighted in ¶12.28 of the supporting text.

Criteria 8: Measures to improve cycling and walking

37. The requirement to improve cycling and walking routes along Crewe and Gresty Road is consistent with national and local planning policy, including

LPS Policy CO 1 'Sustainable Travel and Transport'. As set out in Appendix 4 of the Crewe Settlement Report [ED 28], the Public Rights of Way Officer confirmed that walking and cycling routes to the site would need to be improved to provide access to employment, including along Crewe Road. The provision and/or improvement of walking and cycling links between development sites and public transport hubs and other local facilities is an important and legitimate planning requirement.